

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

15-13369
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US BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

IN RE:)	
)	
Andre Bisasor)	Chapter 7
)	Case No.: 15-13369
Debtor,)	
)	

**ADDITIONAL REQUEST FOR EXTENSION OF TIME TO FILE OBJECTION TO
APPLICATION FOR COMPENSATION**

I, Andre Bisasor, hereby request an absolute final extension of time until 3/29/16 to file objection to debtor's counsel (David G. Baker) application for compensation. Grounds are as follows:

1. As this Court is aware, I have previously had some challenges in getting new counsel.
2. I am informing the Court that I am now close to getting new counsel.
3. In particular, I have spoken to one such potential new counsel who has advised that I request of the Court one last extension due to extenuating circumstances in that I am close to getting new counsel and in that I have follow-up meetings this week/next week towards finalizing/securing new counsel.
4. Some of the key obstacles that I have had in getting new counsel includes finalizing cost and scope of work. For example:
 - a. New counsel has to review the underlying state court and bankruptcy court litigation, the appeals, the chapter 13 record, the chapter 7 conversion and the related litigation in federal court as well as a pending settlement matter.
 - b. The objection to Baker's application to compensation is only one part of what new counsel is required to take on in representing me. If new counsel only had to address the objection to Baker's application for compensation, then it would be less complicated to some extent.
 - c. Similarly, if I was hiring new counsel to only do a simple and straightforward Chapter 7 case, then it would be a little less difficult
 - d. There are also complications arising from the implications of the malicious way in which Mr. Baker withdrew from the case as well as the high amount of money that he is seeking in his application.
 - e. Furthermore, it takes some amount time for any new counsel to review all of the related matters and to come to an agreement with me regarding the scope of work and to determine the estimated cost.
 - f. I also need time to negotiate and/or to arrange for payment of the agreed-upon cost of representation.
5. Moreover, I have also been advised that the task of responding to Mr. Baker's application for compensation via an objection requires a certain amount of legal knowledge and know-how in order to be effective and that I should not under-estimate what is required in order to prevail in doing an objection.
6. I also have spoken to the trustee and, given the matters involved in my case including a pending settlement that involves the Landlord and myself (as well as my wife), it has become even more

- clear to me how important it is that I have new counsel and not try to do this on my own, if possible. The trustee has allowed one last extension until March 29, 2016 to find new counsel.
7. Hence, given the above, I am asking the same of the court. i.e. to be allowed one last extension until March 29, 2016 to finalize counsel.
 8. I apologize for not being able to secure counsel sooner but it appears that I underestimated the challenges and complicating factors involved in doing so. Also, although I was trying to be judicious and sparing in the amount of time I previously requested for finding new counsel, I should have simply asked for enough time upfront in the aggregate, rather than asking the court for two weeks of extension at a time and thus naively putting myself under a tight timeline to get new counsel on board.
 9. Given the Court's grace previously provided to me so far on this matter, I hesitate to ask for another extension of time. However, if it pleases the court, this would be the absolute last time such a request will be made regarding this issue. If I am not able to secure the assistance of counsel within this absolute last extension period, I will move forward with doing the best I can with the objection, on my own, no matter what. However, I expect that I am close to getting counsel soon and expect to do so certainly by the time 3/29/16 comes around. Also, once I get new counsel, he will need time to get caught up with the case and to prepare a necessary and effective response.
 10. All in all, in the long run, it will serve the court and the process much better for me to have the assistance of counsel, which I believe will redound to judicial economy.
 11. Therefore, I am asking for an absolute last extension of time until 3/29/16 which is the same time the trustee has allowed for me to find counsel.

WHEREFORE, I hereby humbly request this Honorable Court grant my request and/or other relief that the Court deems just and proper.

Respectfully submitted,
By The Debtor

Andre Bisasor
Andre Bisasor
119 Drum Hill Rd, #233
Chelmsford MA 01824
781-492-5675

Dated: February 29, 2016

FILED
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CLERK OF COURT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following on February 29, 2016.

Andre Bisasor
Debtor Andre Bisasor
119 Drum Hill Rd, #233
Chelmsford MA 01824
781-492-5675

David Baker
236 Huntington Avenue, #302
Boston MA 02115

John Aquino
240 Lewis Wharf
Boston MA 02110

John Fitzgerald
5 Post Office Sq, #1000
Boston MA 02109

Dated: February 29, 2016

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